

LEVIN-EPSTEIN & ASSOCIATES, P.C.

60 East 42nd Street • Suite 4700 • New York, New York 10165
T: 212.792.0046 • E: Joshua@levinepstein.com

April 24, 2023

VIA ECF

The Honorable Ramon E. Reyes, Jr., U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza E.
Brooklyn, NY 11201

Re: *Perez v. 66 Meat Corp. et al*
Case No.: 1:22-cv-07003-ARR-RER

Dear Honorable Magistrate Judge Reyes:

This law firm represents Plaintiff Angel Perez (the “Plaintiff”) in the above-referenced matter.

This letter respectfully serves as a request for an enlargement of time to serve individual defendant Ameer Mujalli and 50-01 Meat Corp., 205 Meat Corp., and 509 Meat Corp., to, through and including May 12, 2023,

Plaintiff’s process servers completed service on Individual Defendant Mohammad Mujalli and 66 Meat Corp. on or around April 17, 2023 [See Dckt. Nos. 11, 12]. On April 24, 2023, the undersigned was advised by Plaintiff’s process servers that service on the remaining defendants is still outstanding, but is expected to be completed on or before May 12, 2023.

The undersigned intends to proceed with the scheduling of an initial case conference once Defendants have appeared, or alternatively, proceed with the filing of a motion for default, in the event of Defendants’ continued non-appearance.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi
Jason Mizrahi, Esq.
60 East 42nd Street, Suite 4700
New York, New York 10165
Tel. No.: (212) 792-0048
Email: Jason@levinepstein.com
Attorneys for Plaintiff

VIA ECF: All Counsel